

WRIGHT, FINLAY & ZAK, LLP
 Darren T. Brenner, Esq.
 Nevada Bar No. 8386
 Lindsay D. Robbins, Esq.
 Nevada Bar No. 13474
 7785 W. Sahara Ave., Suite 200
 Las Vegas, NV 89117
 (702) 637-2345; Fax: (702) 946-1345
lrobbins@wrightlegal.net

Attorneys for Plaintiff, HSBC Bank USA, National Association, as Trustee for the Certificateholders of ACE Securities Corp. Home Equity Loan Trust, Series 2007-WM1, Asset-Backed Pass-Through Certificates

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

HSBC BANK USA, NATIONAL
 ASSOCIATION, AS TRUSTEE FOR THE
 CERTIFICATEHOLDERS OF ACE
 SECURITIES CORP. HOME EQUITY LOAN
 TRUST, SERIES 2007-WM1, ASSET-
 BACKED PASS-THROUGH
 CERTIFICATES,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
 INC.; FIDELITY NATIONAL TITLE
 INSURANCE COMPANY; FIDELITY
 NATIONAL TITLE AGENCY OF NEVADA,
 INC.; DOE INDIVIDUALS I through X; and
 ROE CORPORATIONS XI through XX,
 inclusive,

Defendants.

Case No.: 2:20-cv-01515-JAD-BNW

**STIPULATION AND ORDER TO
 EXTEND TIME PERIOD TO RESPOND
 TO MOTIONS TO DISMISS [ECF Nos.
 11-13]**

[First Request]

ECF No. 16

COMES NOW Plaintiff, HSBC Bank USA, National Association, as Trustee for the Certificateholders of ACE Securities Corp. Home Equity Loan Trust, Series 2007-WM1, Asset-Backed Pass-Through Certificates (“HSBC Bank”), Defendants Fidelity National Title Insurance Company (“FNTIC”) and Fidelity National Title Agency of Nevada, Inc. (“Fidelity Agency”),

1 and Specially-Appearing Defendant Fidelity National Title Group, Inc. (“FNTG”) (collectively,
2 the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

- 3 1. On August 14, 2020, HSBC Bank filed its Complaint in Eighth Judicial District
4 Court, Case No. A-20-819620-C;
- 5 2. On August 17, 2020, FNTIC filed a Petition for Removal to this Court [ECF No. 1];
- 6 3. On September 15, 2020, FNTIC filed a Motion to Dismiss [ECF No. 11];
- 7 4. On September 15, 2020, Fidelity Agency filed a Motion to Dismiss [ECF No. 12];
- 8 5. On September 15, 2020, FNTG filed a Motion to Dismiss [ECF No. 13];
- 9 6. HSBC Bank’s deadline to respond to all pending Motions to Dismiss is currently
10 September 29, 2020;
- 11 7. HSBC Bank’s counsel is requesting an extension until Thursday, October 29, 2020, to
12 file its response to all pending Motions to Dismiss;
- 13 8. This extension is requested to allow counsel for HSBC Bank additional time to
14 review and respond to the points and authorities cited to in the Motions;
- 15 9. Counsel for FNTIC, Fidelity Agency and FNTG does not oppose the requested
16 extension;
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10. This is the first request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 25th day of September, 2020.

WRIGHT, FINLAY & ZAK, LLP

/s/ Lindsay D. Robbins

Lindsay D. Robbins, Esq.

Nevada Bar No. 13474

7785 W. Sahara Ave., Suite 200

Las Vegas, NV 89117

Attorneys for Plaintiff, HSBC Bank USA, National Association, as Trustee for the Certificateholders of ACE Securities Corp. Home Equity Loan Trust, Series 2007-WM1, Asset-Backed Pass-Through Certificates

DATED this 25th of September, 2020.

SINCLAIR BRAUN LLP

/s/ Kevin S. Sinclair

Kevin S. Sinclair, Esq.

Nevada Bar No. 12277

16501 Ventura Boulevard, Suite 400

Encino, California 91436

Attorney for Defendants, Fidelity National Title Group, Inc., Fidelity National Title Insurance Company, and Fidelity National Title Agency of Nevada, Inc.

IT IS SO ORDERED.

Dated this 26th day of September, 2020.


UNITED STATES DISTRICT COURT JUDGE